

From: Steve Allinson [REDACTED]
Sent: 18 May 2026 08:16
To: Consultations
Subject: Policy SS3 and Policy C10 (Merton Park)

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Dear Sir/Madam,

I am writing to formally object to the Draft Canterbury District Local Plan, specifically Policy SS3 and Policy C10 relating to the proposed Merton Park development.

In my view, the plan is Unsound and Legally Non-Compliant due to significant concerns relating to transport infrastructure, the failure to prioritise brownfield development, and unresolved environmental impacts.

Firstly, I am extremely concerned about the transport implications of the proposed development. The Council's revised "bus-led" strategy appears to acknowledge that major junctions, including the A2/A28 Wincheap interchange and M2 Junction 7, will continue to suffer severe congestion. I understand there is currently no agreed Statement of Common Ground with National Highways confirming acceptance of these impacts, which raises serious concerns regarding the Duty to Cooperate and whether the plan can realistically be considered effective.

Secondly, I do not believe the Council has adequately demonstrated that brownfield opportunities have been fully explored before allocating a large-scale greenfield site at Merton Park. There appear to be significant opportunities for regeneration and higher-density housing within existing developed areas, including sites such as Wincheap Retail Estate, city-centre car parks, and vacant student accommodation. It is difficult to justify the loss of Canterbury's historic green setting without first maximising these alternatives.

Finally, I am deeply concerned by the environmental uncertainty surrounding the impact on the Stodmarsh Nature Reserve. The Council's own Habitats Regulations Assessment reportedly states there is uncertainty as to whether the required mitigation measures can actually be delivered. Given the legal protections surrounding internationally important habitats, I do not believe the plan should proceed while such uncertainty remains.

For these reasons, I believe the Local Plan fails the required tests of soundness and legal compliance.

Kind regards,

Steve Allinson

